

EIS001113

Christopher Elliff

01/27/2000 05:38 AM

To: Shirley M Smith/YM/RWDOE@CRWMS
cc:

RECEIVED

JAN 27 2000

Subject: Stop Yucca Mountain Project (Scanned by LFLN1)

Another public inquiry.

----- Forwarded by Christopher Elliff/MV/RWDOE on 01/27/2000 08:40 AM -----

royrendahl@macconnect.com on 01/25/2000 01:35:45 PM



To: Christopher Elliff/MV/RWDOE@CRWMS
cc:

Subject: Stop Yucca Mountain Project (Scanned by LFLN1)

Dear OCRWM,

THE DEIS VIOLATES THE INTENT OF THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA).

1 There is no reasonable alternative action presented in the DEIS normally required in an EIS. The Nuclear Waste Policy Act as amended in 1987 states that "... thee Secretary [of Energy] shall not be required ... to consider the need for a repository, the alternatives to geological disposal, or alternative sites to the Yucca Mountain site;". The Department of Energy (DOE) could have and was asked (1995 scoping hearings) to consider alternative actions, and yet the DOE didn't.

2 The "no-action" discussion of the DEIS is unreasonable, making on-site storage appear to be untenable. It appears as though the no-action discussion is designed to establish a "straw man" to give the preferred alternative (dump at Yucca Mt.) validity. The DEIS gives us no choice. There is no decision to be made, because the DEIS has made it for us. This is completely contrary to the intent of an EIS.

INSUFFICIENT TRANSPORTATION ANALYSIS.

3... There is not clear picture of the transportation routes to be used, and specifically how the waste is to be transported. How is the public to make a decision on the impacts of the project when the transportation impacts

can only be guessed? It should be crystal clear which routes are to be used, the mode of transportation, and where there will be stopping

3 cont. points
for refueling, etc., so that exposure rates can be determined and health impacts evaluated.

4 Privatization is apparently still a possibility at this point, which could completely alter the transportation picture. Is this yet another unknown we are to swallow?

5 The transportation casks have never been full-scale tested. Only 1/4 scale models were tested and the data was extrapolated using computer models to full-size. The General Atomics GA4/9 casks discussed in the DEIS have only just been licensed, but none have been made yet. It is unclear whether the tests are sufficient for all the conditions that will be encountered in cross country transit, especially through mountainous terrain.

INCOMPLETE HEALTH IMPACT ASSESSMENT.

6 It is assumed that the only radiation health impact is one of cancer fatality, "latent cancer fatality." Cancer fatality represents only one of many radiation health impacts; other possible effects are premature aging, mild mutations in offspring, excess tumors, and genetic and teratogenic effects.

7 VIOLATES THE NUCLEAR WASTE POLICY ACT OF 1982.
The fundamental concept of geological disposal as outlined in the act was for waste isolation. Instead the DEIS describes an "evolving" facility design based on delayed release of radioactivity by means of engineered barriers, so the site will leak. How much and when is not clear.

INADEQUATE EVALUATION OF UNCERTAINTIES.

8 The DEIS is full of imprecise language like "very unlikely," "sufficient quantity," "probably would," etc. How are we to make a sound decision on a project of enormous scope as Yucca Mountain when we can't be certain of the science contained within?
All of the "understanding" of how the repository will function in the future is based on computer models, so the long-term impacts are based on arguably incomplete data fed into largely untested models. Since many of these models represent chaotic systems there can be little to no guess work, otherwise the calculated results (long-term impacts) could bear no resemblance to reality.

9 Why is it that the DOE doesn't trust computer models for nuclear weapons testing, but does for the Yucca Mountain Project? Yucca Mountain performance in the far future is at least as complex as weapons design.

VIOLATES THE TREATY OF RUBY VALLEY.

10 The DEIS fails to address the Western Shonshone protest of the use of land outlined in the 1863 Treaty of Ruby Valley with the United States. Use of their aboriginal land for the dumping of nuclear waste is outside of the scope of the treaty. The Western Shonshone National Council contend that their ancestors would never have signed the Treaty of Ruby Valley had they been able foresee the dumping of such a substance as nuclear waste on their land. The Western Shonshone Nation has declared their land, Newe Sogobia, nuclear free.

INSUFFICIENT PUBLIC PROCESS.

11 While there have been a number of hearings in Nevada, there will be only 7 hearings outside of Nevada. The sheer scope of the transportation portion of this project should require a public hearing in at least all major cities along the transportation routes. The DOE claims it would have been too costly to conduct more hearings. If this is so then why wasn't the hearing process budgeted into the entire project? It is hard to believe that the cost of good public process could even compare to the current expenditures, in the billions, to date. If the DOE really wanted the final EIS to be the best possible then one would expect that the DOE would have advertised the hearings widely and held more hearings to get the most input possible. Why didn't this happen?

Roy Rendahl